

# EXHIBIT 1

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

**IN RE FLINT WATER LITIGATION**

Case No. 5:16-cv-10444-JEK-  
MKM

Hon. Judith E. Levy

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**DECLARATION OF JAMES M. CAMPBELL IN SUPPORT OF  
DEFENDANTS VEOLIA NORTH AMERICA, LLC, VEOLIA NORTH  
AMERICA, INC., AND VEOLIA WATER NORTH AMERICA  
OPERATING SERVICES, LLC'S MOTION FOR PROTECTIVE ORDER  
BARRING THE DEPOSITION OF FRANCIS FERRARA**

I, James M. Campbell, declare as follows:

1. I am a partner of the law firm of Campbell Conroy & O'Neil, P.C., and I represent Defendants Veolia North America, LLC, Veolia North America, Inc., and Veolia Water North America Operating Services, LLC (collectively, VNA) in the above-captioned matter. I have personal knowledge of the matters stated in this Declaration.

2. Attached as Exhibit 2 is a true and correct excerpt of the transcript of the deposition of Mr. Jace W. Connor.

I declare, under penalty of perjury, that the foregoing is true and correct.

Executed on December 20, 2022  
Boston, Massachusetts

*/s/ James M. Campbell*  
James M. Campbell